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*Attorneys for Chip Ganassi Racing
with Felix Sabates, Inc. and Chip
Ganassi Racing LLC*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

DOUBLE JUMP, INC.,

Debtors.

- ☒ Affects All Debtors
☐ Affects Double Jump, Inc.
☐ Affects DC Solar Solutions, Inc.
☐ Affects DC Solar Distribution, Inc.
☐ Affects DC Solar Freedom, Inc.

Lead Case No.: BK-19-50102-gs
(Chapter 7)

Jointly Administered with:

19-50130-gs	DC Solar Solutions, Inc.
19-50131-gs	DC Solar Distribution, Inc.
19-50135-gs	DC Solar Freedom, Inc.

**MOTION FOR EXTENSION OF DEADLINE TO FILE REPLY BRIEF IN SUPPORT
OF TRUSTEE'S MOTION TO ESTABLISH PROTOCOL FOR PRODUCTION OF
DOCUMENTS (DKT. NO. 2796)**

Chip Ganassi Racing with Felix Sabates, Inc. and Chip Ganassi Racing LLC (collectively “**CGR**”), by and through its counsel, hereby respectfully requests an extension of time, up to and including October 26, 2021, to file a brief reply in support of the Motion to Establish Protocol for Production of Documents (Dkt. No. 2796) (the “Motion”) filed by Christina W. Lovato, in her capacity as the chapter 7 trustee (“Trustee”) to be heard at the hearing scheduled for October 28, 2021. CGR wishes to address in its brief reply, and to be heard at the hearing set for October 28, 2021, how the Motion, and the protocol proposed therein, ensures compliance with the Stipulation

and Protective Order Regarding Production of Documents (Dkt. 2041) between CGR and the Trustee. This Motion is not imposed for purposes of delay and will not otherwise effect any filings regarding the Motion or the hearing to be held October 28, 2021.

CGR respectfully requests that it be granted an extension up to and including October 26, 2021, to file a brief reply in support of the Motion.

Dated: October 21, 2021

Respectfully Submitted,

/s/ Rick R. Hsu

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Maupin, Cox & LeGoy and that on the 21st day of October 2021, I caused to be served a true and correct copy of the within document in the following manner:

- X (ELECTRONIC SERVICE) Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.
- ☐ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.
- ☐ (OVERNIGHT COURIER) By depositing a true and correct copy of the above referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.
- ☐ (FACSIMILE) That I served a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written.

/s/Heather Motta
Employee